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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 JESUS GONZALEZ,

9 Plaintiff,

10 vs.

11 CLARITY SERVICES, INC.; EQUIFAX
12 INFORMATION SERVICES, LLC;
13 EXPERIAN INFORMATION SOLUTIONS,
14 INC.; NATIONAL CONSUMER TELECOM
15 & UTILITIES EXCHANGE; TRANS UNION,
16 LLC dba CASH FACTORY USA; CONN
17 APPLIANCES, INC.; GREAT AMERICAN
18 FINANCE HOLDINGS, LLC; AT&T
19 MOBILITY, LLC; and COX
20 COMMUNICATIONS LAS VEGAS, INC.,

21 Defendants.

Case No.: 2:21-CV-01068-APG-BNW

**JOINT MOTION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFF'S COMPLAINT (SECOND
REQUEST)**

22 Plaintiff, Jesus Gonzalez ("Plaintiff"), and Defendant, Conn Appliances, Inc. ("Conn")
23 (collectively "Parties"), by and through their counsel of record, hereby move as follows:

24 On June 7, 2021, Plaintiff filed his Complaint [ECF No. 1]. Conn was served with
25 Plaintiff's Complaint on July 16, 2021. The original deadline for Conn to respond to Plaintiff's
26 Complaint was August 6, 2021. On August 9, 2021, the Court granted Conn's Unopposed Motion
27 to Extend Time to Respond to Plaintiff's Complaint, which set September 7, 2021, as the new
28 deadline [ECF No. 21]. Plaintiff then filed an Amended Complaint on August 12, 2021. [ECF
No. 25]. The Parties have discussed extending the deadline for Conn to respond to Plaintiff's
Amended Complaint to allow for better investigation of the allegations and discuss possible

1 resolution of the matter.

2 WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Conn to file
3 their responsive pleading to Plaintiff's Amended Complaint to September 21, 2021.

4 This is the second motion for an extension of time for Conn to file their responsive
5 pleading. The parties are actively discussing settlement. In the event the parties cannot resolve the
6 case, it is anticipated that they will stipulate to remove the case to arbitration. The extension is
7 requested in good faith and is not for purposes of delay or prejudice to any other party.

8 As part of this motion, Conn agrees to participate in any Rule 26(f) conference that occurs
9 during the pendency of this extension.

10 DATED this 9th day of September, 2021.

11
12 WRIGHT, FINLAY & ZAK, LLP

KIND LAW

13 /s/ Ramir M. Hernandez

/s/ Michael Kind

14 Ramir M. Hernandez, Esq.

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18 *Attorneys for Defendant, Conn Appliances,*
19 *Inc.*

Attorneys for Plaintiff, Jesus Gonzalez

20 **Order**

21 **IT IS SO ORDERED**

22 **DATED:** 10:10 am, September 10, 2021

23 

24 **BRENDA WEKSLER**

25 **UNITED STATES MAGISTRATE JUDGE**
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